UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VMWARE, INC.
Petitioner

v.

ELECTRONICS AND TELECOMMUNICATIONS RESEARCH INSTITUTE
Patent Owner

Case No. IPR2014-00901
Patent No. 6,978,346

PATENT OWNER'S PRELIMINARY RESPONSE TO PETITION FOR *INTER PARTES* REVIEW

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